

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
No. 7:23-CV-897**

IN RE:

CAMP LEJEUNE WATER LITIGATION

This Document Relates to:

ALL CASES

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**PLAINTIFFS' LEADERSHIP GROUP MOTION FOR RELIEF  
FROM E.D.N.C. LOCAL CIVIL RULE 56.1(a)**

The Plaintiffs' Leadership Group ("PLG") respectfully moves for leave to file PLG's Motion For Partial Summary Judgment On Issue Of Specific Causation without an accompanying Statement of Undisputed Material Facts. In support, the PLG states:

1. The PLG is contemporaneously filing its Motion for Partial Summary Judgment On Issue of Specific Causation (the "Motion").
2. The Motion presents a pure question of law related to the interpretation of the causation element of the Camp Lejeune Justice Act. Pub. L. No. 117-168, § 804, 136 Stat. 1802, 1802-04 (2022) (to be codified at 28 U.S.C. § 2671 note).
3. There are no facts—disputed or otherwise—that the Court need consider in order to adjudicate the Motion.
4. Therefore, pursuant to E.D.N.C. Local Civil Rule 56.1(b), the PLG respectfully requests that the parties be granted relief from E.D.N.C. Local Civil Rule 56.1(a)'s requirement to file a Statement of Material Facts (and an opposing statement), since such statements are "inappropriate" under the circumstances. *See* E.D.N.C. Local Civil Rule 56.1(b).

WHEREFORE, the PLG respectfully requests that the parties be relieved of any obligation,

pursuant to E.D.N.C. Local Civil Rule 56.1(a), to file a statement of material facts or opposing statement of material facts in connection with the PLG's *Motion For Partial Summary Judgment On Issue of Specific Causation*.

Respectfully submitted, this 15th day of January, 2024.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 15, 2024, a copy of the foregoing document was served on all counsel of record by operation of the court's electronic filing system and can be accessed through that system.

*/s/ J. Edward Bell, III*  
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